REMARKS

I. Summary

Claims 1, 3-6, 13-14, and 17-21 are pending.   No amendments were made. Applicants respectfully request reconsideration in view of the following remarks.

II. Summary of Interview

Applicant thanks Examiner Christyann Pulliam for the courtesies extended to the undersigned attorney, during the telephone interview of March 17, 2010.   During the interview, the undersigned attorney clarified claim features. The applicability of the cited references to the claims was also discussed.   Examiner Pulliam agreed to reconsider the references when a reply to the Office Action is filed.

III. Claim Rejections – 35 U.S.C. § 103

Claims 1, 3-6, 13-14, 17, and 19-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,995,965 to Experton ("Experton") in view of U.S. Patent No. 6,167,438 to Yates et al. ("Yates") and in further view of U.S. Patent No. 5, 724,575 to Hoover et al. ("Hoover"). Claim 18 stands rejected under 35 U.S.C. § 103(a) as unpatentable over Experton in view of Yates, and further in view of Hoover and U.S. Patent No. 5,345,586 to Hamala et al. ("Hamala").   Applicant respectfully traverses these rejections for the following reasons.

A. Claim 1

Experton, Yates, and Hoover, either alone or in combination, fail to teach or suggest the features of claim 1 of:

> receiving a query from a client machine at one of the servers, wherein the query is for the <u>data</u> generated by the plurality of data generating devices and the query is based on the unique identifier;
> the one of the servers, <u>in response to</u> the query received from the client machine, <u>querying at least one parent server</u> of the one of the servers <u>until</u> the second unique <u>location</u> identifier associated with the unique identifier <u>is found</u>, the at least one parent server included in the servers;

> transmitting the second unique <u>location</u> identifier to the client machine <u>in response to the query</u> received at the one of the servers; and
>
> the data generating device transmitting <u>data</u> generated by the data generating device to the client machine <u>directly over a peer-to-peer connection</u> established in response to transmitting the second unique location identifier to the client machine

(emphasis Applicant's). Experton fails to describe the features of "receiving a query from a client machine at one of the servers, wherein the query is for the <u>data</u> generated by the plurality of data generating devices; ... transmitting the second unique <u>location</u> identifier to the client machine <u>in response to</u> the query received at the one of the servers." In sharp contrast, Experton describes remote network address data, 110 and 120, <u>pre-stored</u> in a card 100, such as a "smart card," and/or in a local processing unit 200. (Experton, Col. 4, lines 43-45; and FIG 1.) The remote network address data, 110 and 210, "includes the address of a remote processing unit where each record is stored, as well as the sub-addresses for the various requested records." (Experton, Col. 8, lines 43-46.) The "<u>required</u> steps [of entering] the remote network address of the needed remote processing facility" to retrieve data from the remote processing facility are unnecessary because the remote network address is "<u>pre-stored</u> in the access memory" of the card 100 and/or the local processing unit 200 (Experton, Col. 9, lines 12-24) (emphasis Applicant's). The address of the remote processing unit and the sub-addresses are included in any request for records. (Experton, Col. 8, lines 43-46.) Therefore, the system described in Experton requires remote network address data to be <u>pre-stored</u> in the card 100 and/or the local processing unit 200.

Because the remote network address data 110 and 120 must be <u>pre-stored</u> in the card 100 and/or in a local processing unit 200, Experton would fail if the location of the needed remote processing facility were to change. As acknowledged in the office action, Experton does not describe the features of claim 1 of "associating the unique identifier with a second unique location identifier of the data generating device <u>in response to a change in a location</u> of the data generating device." (Office Action, p. 5, last paragraph.) The "central

list of user information sites" described in Experton is merely for data replication between the remote processing facilities. The purpose of maintaining the list of user information sites so that "facilities can then contact each other periodically in order to update data that is held in common" (Col. 6, line 10-11)(emphasis Applicant's). Data may be replicated between the facilities "in order to eliminate the risk of mutually contradictory stored data." (Col. 6, lines 4-5.) Experton describes uploading to, and downloading from, multiple remote processing facilities. (Experton, Col. 9, lines 50-67 through Col. 10, lines 1-20.) However, in each case, "the local processing unit 200 transfers via the network identification data (from the user ID memory 108 and the provider ID memory 208 ... as well as the addresses and sub-addresses of the records" to the corresponding remote processing facility (Experton, Col. 10, lines 7-9) (emphasis Applicant's). Accordingly, Experton fails to describe the features of claim 1 of "receiving a query from a client machine at one of the servers, wherein the query is for the data generated by the plurality of data generating devices; ... transmitting the second unique location identifier to the client machine in response to the query received at the one of the servers."

Additionally, Experton also fails to describe the features of "the one of the servers, in response to the query received from the client machine, querying at least one parent server of the one of the servers until the second unique location identifier associated with the unique identifier is found, the at least one parent server included in the servers" (contra, Office Action, p. 4, line, 3rd paragraph) (emphasis Applicant's). Note that "the servers" refers to "a plurality of servers in a tree structure" recited in claim 1. In contrast to these features, the remote facility 300 described in Experton "senses which sub-record addresses are to be downloaded from the record memory 314" and then transmits the requested records to the card and/or the local processing unit. (Experton, Col. 11, lines 13-14; see also, Col. 10, lines 1-20.) Consequently, Experton fails to describe all of the features of claim 1.

Like Experton, Yates also fails to describe the features of claim 1 of "receiving a query from a client machine at one of the servers, wherein the query is for the <u>data</u> generated by the plurality of data generating devices; ... transmitting the second unique <u>location</u> identifier to the client machine <u>in response to</u> the query received at the one of the servers." Yates describes "a caching scheme that exploits the fact that the paths that document requests follow through a computer network from a client to a particular document on a particular home server naturally form a routing graph, or tree." (Yates, Col. 3, lines 23-27.)   According to the caching scheme described in Yates, "cache servers are placed throughout the network, such that if a <u>document request</u> can be fulfilled at some intermediate node along the routing graph, [the request] will be serviced by the intermediate node <u>returning the cached document</u> to the client" (Yates, Col. 3, lines 28-32) (emphasis Applicant's).   Therefore, Yates fails to describe the features described more fully above of "transmitting the second unique <u>location</u> identifier to the client machine <u>in response to</u> the query received at the one of the servers."

Furthermore, Yates teaches away from these features. The caching scheme described in Yates "<u>avoids</u> the need for clients <u>to lookup the locations</u> of cache copies, either by directly contacting the home server 20, or a naming service such as a Domain Name Service (DNS), or by probing the network in search of appropriate cache copies" (Yates, Col. 7, lines 13-17) (emphasis Applicant's).

Yates also fails to describe the features of claim 1 of "the one of the <u>servers, in response to</u> the query received from the client machine, <u>querying at least one parent server</u> of the one of the servers <u>until</u> the second unique <u>location</u> identifier associated with the unique identifier <u>is found</u>, the at least one parent server included in the servers [in a tree structure]." In Yates "if a <u>document request</u> can be fulfilled at some intermediate node along the routing graph, [the request] will be serviced by the intermediate node <u>returning the cached document</u> to the client" (Yates, Col. 3, lines 28-32) (emphasis Applicant's).   If

not, the <u>document</u> is returned from the home server at the end of the routing graph. Therefore Yates fails to describe the features of "the one of the <u>servers</u>, ... <u>querying at least one parent server</u> of the one of the servers <u>until</u> the second unique <u>location</u> identifier associated with the unique identifier <u>is found</u>."

Like Experton and Yates, Hoover also fails to describe all of the features of claim 1. For example, Hoover fails to describe the features of "receiving a query from a client machine at one of the servers, wherein the query is for the <u>data</u> generated by the plurality of data generating devices; ... transmitting the second unique <u>location</u> identifier to the client machine <u>in response to</u> the query received at the one of the servers."   Hoover describes an object-based distributed database system, in which data is stored in remote data databases. (Hoover, Abstract.) The system of Hoover stores location information relating to the data in a <u>centralized</u> object broker for object management. (*Id*.) The location information is used for routing messages <u>from</u> the centralized object broker <u>to</u> a selected one of the user computer sites 12.   The centralized object broker 20 receives the messages, such as search, get, add, and update, and provides specific responses to those requests. (Hoover, Col. 28, lines 21-43.) The "users at the remote client sites 12 are <u>not</u> directly involved with the creation of object identifiers, with global object address space allocation, or maintenance of any tables relating [to] <u>location</u> [of] or status pertaining to the various objects" (Hoover, Col. 22, lines 22-27) (emphasis Applicant's).   Indeed, the distributed nature of data managed by the centralized object broker 20 is "transparent (i.e., invisible) to the users." (Hoover, Col. 22, lines 22-23.)

> [A]n object broker API 36 [is] at the logical boundary between a customer database 26 and a remote database 28. The object broker API 36 is operative to transform or map commands that originate with a requesting computer system ... The object broker 20 responds by formulating appropriate commands to one or more selected remote databases 28 within the system so as to <u>retrieve</u> selected <u>data items</u> appropriate for the data model and to ultimately <u>provide</u> the requested information back <u>to a requesting computer</u> system. Thus, the object broker API 36 serves as the logical connection between a customer database 26, which can be of varying types and is therefore heterogeneous, to a uniform system-

wide convention so that data can be exchanged between the heterogeneous user computers in a <u>transparent</u> and efficient manner.

(Hoover, Col. 11, lines 55-67 through Col. 12, lines 1-4) (emphasis Applicant's). Therefore, Hoover fails to describe the features described more fully above of "transmitting the second unique <u>location</u> identifier to the client machine <u>in response to</u> the query received at the one of the servers."

Additionally, Hoover teaches away from the features of "receiving a query from a client machine at one of the servers, wherein the query is for the <u>data</u> generated by the plurality of data generating devices; ... transmitting the second unique <u>location</u> identifier to the client machine <u>in response to</u> the query received at the one of the servers." Hoover disparages systems described in literature that "teaches away from the use of a <u>centralized</u> server for purposes of object management." (Hoover, Col. 4, lines 42-44) (emphasis Applicant's). Because the centralized object broker 20 includes the location information, the distributed nature of data managed by the centralized object broker 20 is "transparent (i.e., invisible) to the users." (Hoover, Col. 22, lines 22-23.) Therefore, Hoover teaches away from the features described more fully above of "transmitting the second unique <u>location</u> identifier to the client machine <u>in response to</u> the query received at the one of the servers."

Hoover also fails to describe the features of claim 1 of "the one of the <u>servers</u>, <u>in response to</u> the query received from the client machine, <u>querying at least one parent server</u> of the one of the servers <u>until</u> the second unique <u>location</u> identifier associated with the unique identifier <u>is found</u>, the at least one parent server included in the servers [in a tree structure]." In contrast, the system of Hoover stores location information in a <u>centralized</u> object broker so that the object broker already has the location information at hand. (Hoover, Abstract.) Therefore, Hoover fails to describe all of the features of claim 1.

For the foregoing reasons, Experton, Yates, and Hoover fail to describe all of the features of claim 1. Yates and Hoover teach away from the features

recited in claim 1. Therefore, Experton, Yates, and Hoover, either alone or in combination, fail to teach or suggest all of the features of claim 1.

B. Claims 3-6

Claims 3-6 depend from, and include the features of, claim 1. Thus, dependent claims 3-6 are allowable for at least the same reasons that independent claim 1 is allowable.

C. Claim 13

For at least the forgoing reasons, Experton, Yates, and Hoover, either alone or in combination, fail to teach or suggest the features of claim 13 of:

> receiving a query from a client machine at one of the servers, wherein the query is for data generated by the data generating device and the query is based on the unique identifier;
> the one of the servers, in response to the query received from the client machine, sending a request to at least one parent server of the one of the servers until the unique identifier is found, the at least one parent server included in the servers;
> transmitting the second unique location identifier to the client machine in response to the query received at the one of the servers; and
> the data generating device transmitting data generated by the data generating device to the client machine directly over a peer-to-peer connection created in response to transmitting the second unique location identifier to the client machine.

D. Claims 14 and 17-19

Claims 14 and 17-19 depend from, and include the features of, claim 13. Thus, dependent claims 14 and 17-19 are allowable for at least the same reasons that independent claim 13 is allowable.

Another reason that claim 19 is allowable is that Experton fails to describe the features of claim 19 of "updating data in the network <u>by</u> modifying an association of the unique data identifier and the second unique location identifier" (*contra,* Office Action, p. 11, second paragraph) (emphasis Applicant's). Instead, Experton describes updating a time stamp in the central list of user information sites <u>whenever</u> "the records are records are accessed or changed."

(Experton, Col. 6, lines 11-19.) Therefore, Experton fails to describe "updating data in the network <u>by</u> modifying an association of the unique data identifier and the second unique location identifier." Yates, and Hoover were cited in connection with other features and fail to describe the features of claim 19. Accordingly, Experton, Yates, and Hoover, either alone or in combination, fail to teach or suggest all of the features of claim 19.

E. Claim 20

For at least the forgoing reasons, Experton, Yates, and Hoover, either alone or in combination, fail to teach or suggest the features of claim 20 of:

> one of a plurality of servers receiving a query from a client machine, wherein the query is for the data generated by the data generating device;
> the one of the servers querying, in response to the query received from the client machine, at least one parent server of the one of the servers to find the second unique location identifier, the at least one parent server included in the servers, and the servers arranged in a tree structure;
> transmitting the second unique location identifier to the client machine after receiving a response to the query sent to the at least one parent server; and
> transmitting the data generated by the data generating device from the data generating device to the client machine over a connection created between the data generation device and the client machine after transmitting the second unique location identifier to the client machine.

F. Claim 21

Claim 21 depends from, and includes the features of, claim 20. Thus, dependent claim 21 is allowable for at least the same reasons that independent claim 20 is allowable.

Claim 21 is allowable for another reason. Experton fails to describe the features of claim 21 of "automatically detecting and integrating spontaneously added <u>data generating devices</u> at the at least one server" (*contra*, Office Action, pp. 13-14) (emphasis Applicant's). In contrast, Experton describes an existing "remote processor 302 may be in communication with a provider of such stock price data and would continually update the corresponding <u>record</u> 314 with the

price quotes and quotation times" (Experton, Col. 11, lines 61-65) (emphasis Applicant's). Continually updating of the record 314 with the quote data may not properly be construed as equivalent to "detecting and integrating spontaneously added data generating devices." Yates, and Hoover were cited in connection with other features and fail to describe the features of claim 21. Accordingly, Experton, Yates, and Hoover, either alone or in combination, fail to teach or suggest all of the features of claim 21.

G. Withdrawal of the Rejections of Pending Claims

For at least the foregoing reasons, claims 1, 3-6, 13-14, and 17-21 are allowable. Accordingly, Applicant respectfully requests withdrawal of the 35 USC §103(a) rejections of claims 1, 3-6, 13-14, and 17-21.

IV. Conclusion

The present pending claims of this application are allowable and Applicant respectfully requests the Examiner to issue a Notice of Allowance for this application. Should the Examiner deem a telephone conference to be beneficial in expediting allowance/examination of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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